

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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**STAR AUTO SALES OF QUEENS LLC
d/b/a STAR SUBARU,**

Civil Case No.: 19-06791 (MKB) (ST)

Plaintiff,

-against-

**HANIE ISKANDER, a/k/a “John Alexander”
AND NAGWA YOUSEIF a/k/a “Nagwa F Youseif,**

Defendants.
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DECLARATION IN OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS

JAMIE S. FELSEN, ESQ., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and I am a member of Milman Labuda Law Group PLLC, attorneys for Plaintiff, Star Auto Sales of Queens LLC (hereinafter “Plaintiff” or “Star Subaru”) in this action.
2. I respectfully submit this Declaration in opposition to Defendants’ Motion to Dismiss (hereinafter the “Motion”), and to supply this Court with exhibits relevant to its determination of the Motion.
3. Annexed hereto as **Exhibit A** is a true and correct copy of the amended complaint from Plaintiff’s action against Douglas Filardo in the Supreme Court of New York, Queens County (“Douglas Filardo Action”).
4. Annexed hereto as **Exhibit B** is a true and correct copy of the notice of entry with short form order dated March 15, 2021, striking Douglas Filardo’s answer in the Douglas Filardo Action.

5. Annexed hereto as **Exhibit C** is a true and correct copy of a screenshot from New Vision Advertising's website indicating that Defendant Nagwa Youseif was the executive producer. Shortly after Defendant Hanie Iskander's deposition in this action, this webpage was removed from the website.

Dated: Lake Success, New York
June 17, 2021

/s/
JAMIE S. FELSEN, ESQ.